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SKYNET ELECTRONIC CO., LTD.

16
17 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 SKYNET ELECTRONIC CO., LTD.,

Case No. CV-12-6317-WHA

20 Plaintiff/Counter-Defendant,

21 v.

22 FLEXTRONICS INTERNATIONAL, LTD. and
POWER SYSTEMS TECHNOLOGIES LTD.,

STIPULATED DISCOVERY ORDER

23 Defendants/Counter-Claimants.

1 It is hereby Ordered:

- 2 1. With respect to Skynet interrogatory 20(c), but limited only to chargers, by January 8,
3 2014, Flextronics shall advise as to the number of chargers it has manufactured that have
4 two switches on the primary side of the transformer in the flyback circuit and, shall
5 provide the model numbers of any such chargers and identify those chargers that have
6 been sold since the filing of the Complaint. Flextronics shall produce by January 17,
7 2014 circuit diagrams for (a) all such chargers sold or shipped since June 1, 2012 or later
8 and (b) all such chargers manufactured since the filing date of the '318 patent that
9 perform a zero voltage switch.
- 10 2. Flextronics will advise Skynet by January 8, 2014 as to the existence of contracts,
11 statements of works, specifications, and/or scopes of work with Apple, Foxconn and
12 Amazon, other than agreements produced prior to the date of this Order (such as the
13 agreement at Bates numbers FLEX0036890-FLEX0036927), related to the accused
14 products and, if there are any, produce them by January 17, 2014. Throughout this Order,
15 "accused products" shall mean the accused products listed in the most recent amended
16 version of the Complaint, components and circuitry thereof, and all such chargers
17 identified in 1(b) of this Order, if any.
- 18 3. Flextronics shall advise Skynet by January 8, 2014 as to the availability of purchase
19 orders, invoices, bills of sale, shipping information, bills of lading and forecasts relating
20 to the accused Apple and Amazon chargers, including chargers shipped to Ensky and the
21 parallel shipping entity for Amazon chargers, and shall produce, by January 17, 2014: (a)
22 all such documents dated September 1, 2012 or later and (b) all such documents on a
23 once per month basis from the beginning of life of such accused products until September
24 1, 2012.
- 25 4. Flextronics shall search for confidentiality or non-disclosure agreements with third
26 parties involved in the development of the circuitry and/or production of component parts
27 of the circuitry of the accused products and, by January 10, 2014, advise Skynet as to the
28 existence of any such agreements and, if they exist, produced them by January 17, 2014.

- 1 5. Flextronics shall collect the emails of Bahman Sharifipour, Mark Telefus, Rowell Gapuz,
2 and Subash Bagga. Flextronics shall produce all relevant emails relating to the accused
3 products from Sharifipour and Bagga by January 8, 2014. Flextronics will also search for
4 electronic and other documents relating to the accused products from these custodians
5 and produce those documents and any remaining emails relating to the accused products,
6 including all relevant emails from Telefus and Gapuz, by January 17, 2014.
- 7 6. Flextronics shall collect responsive emails and other responsive documents, electronic or
8 otherwise, of Ted Jackson and Bill Leunis relating to the accused products and complete
9 its investigation of the possibility of obtaining Arian Jansen's emails and Arian Jensen's
10 electronic and hardcopy documents. Flextronics shall produce all such documents by
11 January 17, 2014.
- 12 7. By January 8, 2014, Flextronics shall provide a description of the position of the
13 following individuals and their involvement if any in either the design/development of
14 the circuitry or negotiations/sales of the accused products: Hong Wei Du, Michael Chen,
15 Manny Marimuthu, Mark Medlen, Norman Hsu, Laura Wen, Kindson Tang, Christian
16 Taoatao, Linling Zhang, Bin Li Tommy, Cherub Wang, Victor Gan, Pansy Chen, Lily
17 Jiang, Sunny Sheng, Martin Kon, and Ty Lai. Flextronics will produce responsive emails
18 and other documents from relevant individuals that are (a) related to the design or
19 development of the circuitry of the accused products, (b) related to negotiations involving
20 or sales of the accused products, or (c) specific meetings, events, documents or
21 communications identified by Skynet by January 17, 2014.
- 22 8. Flextronics shall advise Skynet by January 8, 2014 as to the availability of solicitations,
23 RFQs and RFPs (whether formal or informal), responses to solicitations such as RFQs
24 and RFPs (whether formal or informal), and communications prior and related to
25 contracts entered with and from Apple and Amazon relating to the accused Apple and
26 Amazon chargers and produce these documents by January 17, 2014.
- 27 9. Flextronics shall follow-up on its searches for relevant organizational charts and produce
28 any such charts by January 10, 2014. In a letter, Skynet shall provide Flextronics a

1 detailed request for a description of Flextronics' entities, their relationship to the parties,
2 and a description of which entities were and/or are involved in the development, design,
3 sale, marketing, distribution, delivery and production of the accused products by January
4 2, 2014. This request shall not count as one of Skynet's interrogatories. Flextronics shall
5 respond to the detailed request with a complete answer by January 13, 2014 and will
6 swear to and verify this response by January 30, 2014.

7 10. Flextronics shall provide the following information and documents by the dates
8 indicated:

- 9 • whether Flextronics is shipping cables to Foxconn along with the accused Apple
10 and/or Amazon chargers - by January 17, 2014; if shipping cables to Foxconn
11 along with the charges, Flextronics will produce documents relevant to such
12 cables, including documents showing the costs of such cables, quantity purchased
13 and sold, and the amount paid to Flextronics for such cables by January 24, 2014;
- 14 • the existence of any licensing in or out of relevant technology - by January 17,
15 2014; if any such licensed technology exists, Flextronics shall produce all relevant
16 licenses and related communications by January 24, 2014;
- 17 • Documents related to the conception and patenting of the invention described in
18 Flextronics' U.S. Patent No. 7,924,578 and/or U.S. Provisional Patent Application
19 Serial No. 60/773,765 by January 17, 2014.
- 20 • any requests for UL approval for the accused products, including all documents
21 submitted therewith shall be produced by January 17, 2014;
- 22 • communications with Lab126, FoxConn, and Ensky relating to the accused Apple
23 and Amazon chargers shall be produced by Flextronics by January 24, 2014 and
24 relating to all other accused products shall be produced by Flextronics by January
25 31, 2014; and
- 26 • all agreements with Ensky relating to the accused Apple and Amazon chargers
27 shall be produced by Flextronics by January 17, 2014.

1 11. Flextronics shall produce all additional prior art in support of its invalidity contentions by
2 January 17, 2014.

3 12. By January 8, 2014 Flextronics shall investigate and communicate to Skynet the
4 existence of a custom made Flex01 chip by ST Micro and the availability such items as
5 specifications, purchase orders, and correspondence concerning the design of any such
6 chip. Flextronics shall produce such documents by January 17, 2014.

7 13. Flextronics shall inquire as to relevant information regarding the Kodak, Palm, and HP
8 chargers, including schematics, specifications, and sales data. Flextronics shall update
9 Skynet regarding this inquiry by January 10, 2014. Flextronics shall produce such
10 documents by January 17, 2014.

11 14. Flextronics shall provide a complete answer, by January 17, 2014, that of the accused
12 products, only those provided to Amazon and Apple have had sales of more than 20,000
13 units. Such answer shall identify the person most knowledgeable of these facts and
14 declaration from that person that these facts are true to the best of that person's
15 knowledge.

16 15. Flextronics shall supplement the sales data (including number of units sold, cost per unit
17 and amount received per unit) for the accused Apple charger to the present, including
18 sales to Ensky, by January 17, 2014, and update the sales information one week prior to
19 the close of fact discovery.

20 16. Flextronics and Skynet have stipulated to their discovery agreement of December 26,
21 2013 being entered as an order by the Court.

22 17. Flextronics agrees not to oppose a one (1) month extension of Skynet's discovery cut-off
23 if requested by Skynet.

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1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 Date: January 7, 2014

3 Respectfully submitted,

4 /s/ Jaideep Venkatesan
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22 *Attorneys for Plaintiff/Counter-Defendant*
23 SKYNET ELECTRONIC CO., LTD.

24 Pursuant to L.R. 5-1(i)(3), the above signatory attests that concurrence in the filing of this
25 document has been obtained from the signatory below.

26 Date: January 7, 2014

27 /s/ Thomas L. Anastos
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Attorneys for Defendants/Counter-Claimants
FLEXTRONICS INTERNATIONAL, LTD. and
POWER SYSTEMS TECHNOLOGIES LTD.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 8, 2014

